



James B. Wright
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November 30, 2000

Mr. Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

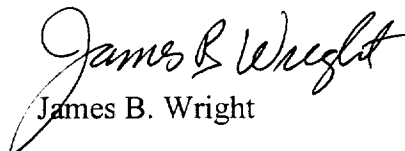
Re: Petition for Arbitration of the Interconnection Agreement Between
BellSouth Telecommunications, Inc. and Sprint Communications
Company L.P. Pursuant to the Telecommunications Act of 1996
Docket No. 00-00691

Dear Mr. Hicks:

Enclosed is Sprint Communications Company L.P.'s First Interrogatories and
Requests for Production of Documents to BellSouth Telecommunications, Inc.

Please contact me if you have any questions.

Very truly yours,


James B. Wright

Enclosure

cc: David Waddell -14 copies
William R. Atkinson
E. Earl Edenfield, Jr.

POSTED
11-30-00

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PETITION FOR ARBITRATION OF THE
INTERCONNECTION AGREEMENT BETWEEN
BELLSOUTH TELECOMMUNICATIONS, INC.
AND SPRINT COMMUNICATIONS COMPANY
L.P. PURSUANT TO THE
TELECOMMUNICATIONS ACT OF 1996

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"Employee(s)" means those persons in the direct employment of either Sprint or BellSouth, past and present.

"Document" or "documentation" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order, form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, e-mail, facsimile ("fax"), cable, report, recording, contract, agreement, study, handwritten note, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape, disk, file stored on computer, or any other written, recorded, transcribed, punched tape, filmed or graphic matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

"Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name, residential and business address, and business relationship to BellSouth or Sprint; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the nature of the document in sufficient detail for identification in a request for production, its title, its date, the name or names of its authors and recipients, its present location or custodian, and if the information or document identified is recorded in electrical, optical or electromagnetic form, a description of the computer hardware and software required to reduce it to humanly readable form; (iv) a communication, requires

you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

"Act" refers to the Communications Act of 1934, as amended (including, without limitation, as amended by the Telecommunications Act of 1996).

"Petition" means the Petition for Arbitration filed by Sprint initiating this proceeding.

"CLEC" means a local exchange carrier that is not an ILEC.

"TRA" refers to the Tennessee Regulatory Authority.

"LEC" means a local exchange carrier, including but not limited to CLECs and ILECs.

"ILEC" means an incumbent local exchange carrier as defined in 47 U.S.C. Section 251(h).

"ISP" means an Internet Service Provider.

"UNE" means unbundled network element.

"Sprint" refers to Sprint Communications Company L.P.

"Telecommunications Service," "basic local exchange" and "local exchange services" are used herein to have the same definitions contained in federal and state rules and regulations.

"Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

"And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories anything that would not otherwise be brought within their scope.

"FCC" refers to the Federal Communications Commission.

INSTRUCTIONS

These Interrogatories and Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. When the information requested by an Interrogatory or Request varies over time, state the response for each period of time as to which the response differs, and identify the time periods. If you cannot answer an Interrogatory or Request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of an Interrogatory or Request, you should so state in your response, describing in full your efforts to obtain the information requested, and then proceed to respond to the fullest extent possible. If you object to any part of an Interrogatory or Request, answer all parts of the Interrogatory or Request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

These Interrogatories and Requests are continuing in nature. Thus, in the event that you obtain additional information with respect to any Interrogatory or Request after it has been answered, you are required to supplement your response promptly following receipt of such additional information, giving the additional information to the same extent as originally requested. If you are unwilling to supplement your responses, please so state.

If any response required by way of answer to these Interrogatories or Request is considered to contain confidential or protected information, please furnish this information subject to an appropriate protective agreement.

In the event you assert that any information requested herein is privileged, you should identify any such information and any supporting documents in your written response, by date, and provide a general description of its content. You also should identify all persons who participated in the preparation of the document and all persons, inside or outside of BellSouth, who received a copy, read or examined any such document. In addition, you should describe, with particularity, the grounds upon which privilege is claimed.

In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

- a. The form in which the requested information currently exists (identifying documents by title or description);
- b. The earliest dates, time period, and location that representatives of Sprint may inspect your files, records or documents in which the information currently exists.

For each Interrogatory and Request answered, provide the name of the person or persons answering, the title of such person(s), and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response. If you do not intend to call or present a witness who is prepared to testify concerning the matters contained in any response, please so state.

Unless otherwise indicated, the information sought in these Interrogatories and Requests relates to BellSouth's and Sprint's operations in Tennessee. However, where a

response to an Interrogatory is true for, or reflects BellSouth's position on a region-wide basis, Sprint requests that BellSouth so indicate in the response.

INTERROGATORIES

1. Please identify any and all experts (including but not limited to, employees or representatives of BellSouth) that you expect to call at the hearing in this matter , and with respect to each expert, please state the following:
 - a. areas of specialty; and
 - b. subject matter and issue numbers upon which he or she is expected to testify.
2. List and describe all Custom Calling Services and other vertical services that BellSouth makes available to Information Service Providers, ("ISPs"), which term includes Enhanced Service Providers, under the FCC's Open Network Architecture (ONA) orders.
3. In addition to any Custom Calling Services and other vertical features identified in your response to the preceding request, are there any non-ONA vertical services that BellSouth offers for resale to ISPs in Tennessee?
4. Has BellSouth ever argued before the Tennessee Regulatory Authority that Custom Calling Services and other vertical features should be priced separately from unbundled local switching? If yes, please identify the docket(s), and the pleading(s) and/or transcript page(s) wherein BellSouth took such a position.

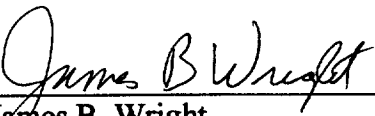
5. Are Custom Calling Services and other vertical features shown as separate line items from basic local exchange services on BellSouth end-user bills in Tennessee?
6. Is it BellSouth's contention that the Tennessee Regulatory Authority does not have jurisdiction to require the payment of reciprocal compensation for ISP-bound calls? If so, please explain the basis of BellSouth's assertion.
7. Please identify the performance measures, if any, that BellSouth proposes to include in Sprint's Interconnection Agreement in Tennessee.
8. Does BellSouth disagree that self-executing remedies, including liquidated damages, should apply in Tennessee?
9. Upon denial of a Sprint request for physical collocation in Tennessee, does BellSouth contend that it could not provide Sprint, or provide Sprint with the ability to obtain, full-sized (e.g., 24" x 36") engineering floor plans and engineering forecasts for the premises in question prior to the walk-through?
10. Please describe in detail the basis for BellSouth's position that it will not provide such full-sized engineering floor plans and engineering forecasts to Sprint, at Sprint's expense, prior to the walk-through.

11. Does BellSouth currently offer in Tennessee, or is it considering offering, any type of "one number" or "single number" service (whether using call forwarding or some other technology such as AIN) which allows an end-user of BellSouth's landline services and mobile service to have one telephone number for both services? If so, please explain how this service works or will work.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please provide all documents identified in BellSouth's responses to Sprint's First Interrogatories filed in this matter.
2. Please provide any and all documents that relate, in any way, to any of the issues set forth in the Joint Issues Matrix filed by the Parties on November 17, 2000.

Respectfully submitted this 30th day of November, 2000.


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